west virginia department of environmental protection

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MEMORANDUM

To: File
From: William T. Rothwell II
Date: March 10, 2015
Subject: Dominion Transmission, Inc. – HG Well #13139 – Lewis County, WV
ID #: 041-00072
APP #: PD15-017

BACKGROUND INFORMATION:

Dominion Transmission, Inc. is proposing the addition of a EPA certified natural gas pumpjack engine to remove fluid from the above subject gas well. The engine will be a Subaru EH72 – 25 BHP @ 1,800 RPM 4SRB engine that was manufactured in 2014.

The engine is a new source (constructed after June 12, 2006), located at an area source of HAPs, and is therefore subject to 40CFR63, Subpart ZZZZ (NESHAP). Due to the year of construction of the engine, it is subject to a substantive requirement of that Federal Rule in which it must comply with 40CFR60 Subpart JJJJ (NSPS) if applicable.

Since the EPA certified engine is ≤ 500 HP and was manufactured after July 1, 2008, although subject to JJJJ, it is not subject to a substantive requirement in 40CFR60 Subpart JJJJ.

The potential emissions for the engine are as follows:

Pollutant	LB/HR	TPY
PM	0.01	0.01
VOCs	0.02	0.10
CO	0.24	1.04
NOx	0.14	0.63
HAPs	0.01	0.03

RECOMMENDATION:

The emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b. Therefore, a permit is not required by this Division for the installation and operation of the above mentioned pumpjack engine.

William T. Rothwell II, P.E.
Engineer

3/10/2015
Date